

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DR. DANIEL C. SHELTON.

Plaintiff,

V.

**DONALD PATTON, NAVEED BAQIR,
YUN FEI LOU, and ALETHEA SMITH-
TUCKER, all individually and in their official
capacities; and BOARD OF EDUCATION OF
THE CHRISTINA SCHOOL DISTRICT,**

Defendants.

• • • • •

C.A. No. 24-1338-CFC

Jury Trial Demanded

STIPULATION

Whereas, Plaintiff Dr. Daniel C. Shelton filed the above-captioned case on December 10, 2024 against Defendants Donald Patton, Naveed Baqir, Yun Fei Lou, Alethea Smith-Tucker, and Board of Education of the Christina School District;

Whereas, counsel for the parties have conferred and, pursuant to Fed.R.Civ.P. 4, counsel for Defendants agreed to accept service on their behalf;

Whereas, the parties have agreed that service was effective on December 16, 2024;

Whereas, the parties have agreed that Defendants shall have until April 21, 2025 to file a response to the Complaint;

It is hereby STIPULATED and AGREED that:

1. Service of the Complaint in this matter is hereby acknowledged by all Defendants to be effective as of December 16, 2024; and
2. Defendants shall Move or Answer the Complaint on or before April 21, 2025.

THE NEUBERGER FIRM, P.A.

/s/ Stephen J. Neuberger

THOMAS S. NEUBERGER, ESQ. (#243)
STEPHEN J. NEUBERGER, ESQ. (#4440)
17 Harlech Drive, P.O. Box 4481
Wilmington, DE 19807
(302) 655-0582
TSN@NeubergerLaw.com
SJN@NeubergerLaw.com

Attorneys for Plaintiff

MARSHALL DENNEHEY

/s/ Sarah B. Cole

SARAH B. COLE, ESQ. (#4685)
CLAIRE M. MCCUDDEN, ESQ. (#5036)
1007 N. Orange Street, Suite 600
P.O. Box 8888
Wilmington, DE 19899
302-552-4364
SBCole@mdwcg.com
MCMcCudden@mdwcg.com

Attorneys for Defendant Board of Education of
the Christina School District

FRANKLIN & PROKOPIK

/s/ William A. Crawford

WILLIAM A. CRAWFORD, ESQ. (#5600)
800 Creek View Road, Suite 300
Newark, DE 19711
302-594-9780
WCrawford@fandpnet.com

Attorneys for Defendant Donald Patton

/s/ Daniel A. Griffith

DANIEL A. GRIFFITH, ESQ. (#4209)
600 North King Street, Suite 300
Wilmington, DE 19801
302-467-4510
DGriffith@whitefordlaw.com

Attorneys for Defendant Naveed Baqir

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

/s/ Marc Sposato

MARC SPOSATO, ESQ. (#5663)
GEORGIA C. PHAM (#6316)
300 Delaware Avenue, Suite 900
Wilmington, DE 19801
302-658-6538
MSposato@moodklaw.com
GPham@moodklaw.com

Attorneys for Defendant Yun Fei Lou

WHITE AND WILLIAMS, LLP

/s/ Daryll M. Hawthorne-Bernardo

CHRISTIAN J. SINGEWALD, ESQ. (#3542)
DARYLL M. HAWTHORNE-BERNARDO
(#6520)
600 North King Street, Suite 800
Wilmington, DE 19801
302-467-4510
SingewaldC@whiteandwilliams.com
HawthorneD@whiteandwilliams.com

Attorneys for Defendant Alethea Smith-Tucker

Dated: February 3, 2025